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8 Attorneys for Plaintiff Mega Distribution Int'l, Inc.

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

MEGA DISTRIBUTION INT'L INC.,  
a California Corporation

Plaintiff,

vs.

ONLINE-LED-STORE

Defendant.

Case No. 5:15-cv-2243

**COMPLAINT FOR INFRINGEMENT  
OF UNITED STATES PATENT  
NO. D614,063;**

**DEMAND FOR JURY TRIAL**

1. Plaintiff Mega Distribution Int'l, Inc., a California corporation ("Mega"), for its complaint, and demanding trial by jury under Rule 38, Fed. R. Civ. P., and Local Rule 38-1, alleges that Online-LED-Store ("Defendant"), a California business, is infringing U.S. Design Patent D614,063 ("the '063 patent"), by making, selling, and offering to sell, in this judicial district, lightbars that infringe the '063 patent.

2. This is a civil action for patent infringement and arises under, among other things, the United States Patent Laws, 35 U. S. C. section 10, et seq. Jurisdiction is therefore based upon 28 U. S. C. sections 1331 and 1338(a),

1 providing for federal question jurisdiction of patent infringement actions and  
2 exclusive jurisdiction of patent infringement actions in the U. S. district courts.

3 3. Plaintiff Mega is informed and believes, and thereon alleges, that venue  
4 in this court is proper under 28 U. S. C. section 1391 (c) and section 1400 (b)  
5 because the acts of patent infringement alleged herein took place, at least in part,  
6 within this judicial district.

7 4. Plaintiff Mega is a California corporation, and has its principal place of  
8 business in Paramount, California.

9 5. Defendant is a California business, and has its principal place of  
10 business in Ontario, California.

11 6. On April 20, 2010, the U. S. Patent and Trademark Office duly and  
12 lawfully issued the '063 patent under the title *Warning Light Lens*. A true and  
13 correct copy of the '063 patent is attached hereto as **Exhibit A**.

14 7. Since 2012, Defendant has infringed the '063 patent by selling, and  
15 offering to sell, in this judicial district and elsewhere in the United States, light bars  
16 with warning light lenses covered by the single claim of the '063 patent.  
17 Defendant's offers to sell and sale, in this judicial district, of Lights Bars,  
18 specifically models LAMPHUS SolarBlast SBWL14 4w LED Windshield Dash  
19 Light Product Code: PSZLEDSTBO401; LAMPHUS SolarBlast SMBB34 LED  
20 Emergency Vehicle Warning Mini Light Bar Product Code: PSZLEDSTB3001; and  
21 LAMPHUS SolarBlast SBTA84 36'' 32W LED Traffic Advisor Directional Light  
22 Bar Product Code: PSZLEDSTB045 , have infringed the '063 patent. Photographs  
23 and a spreadsheet of Defendant's infringing products are attached hereto as **Exhibit**  
24 **B**.

25 8. Upon information and belief, Defendant's infringement has taken place  
26 with full knowledge of the '063 patent and has been intentional, deliberate, and  
27 willful.  
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1           9.     Upon information and belief, Defendant has derived, and will continue  
2 to derive, and received from the above infringement, gains, profits, and advantages  
3 in an amount not presently known to Mega.

4           10.    Defendant's infringement of the '063 patent has damaged Mega in an  
5 unknown amount. These damages continue to grow as Defendant's infringement  
6 continues. Under Section 284 of Title 35 of the United States Code, Mega seeks  
7 damages adequate to compensate for this infringement in an amount no less than  
8 Defendant's total profit, from sales of the infringing products, together with interest  
9 and costs affixed by the Court. Under Section 289 of Title 35 of the United States  
10 Code, Mega also seeks its lost profit.

11           11.    Defendant's continuing infringement of the '063 patent has caused and  
12 continues to cause irreparable harm to Mega, including impairing the value of the  
13 '063 patent in an amount yet to be determined. Pursuant to Section 283 of Title 35  
14 of the United States Code, Mega seeks a preliminary and a permanent injunction  
15 against further infringement of the '063 patent.

16                               **PRAYER FOR RELIEF**

17  
18           WHEREFORE, Mega prays for the following relief from this court against  
19 Defendant:

20           1.     An order, pursuant to 35 U.S.C. Section 271, declaring that Defendant  
21 has infringed the single claim of the '063 patent;

22           2.     A preliminary and a permanent injunction against Defendant,  
23 prohibiting Defendant from further infringement of the '063 patent;

24           3.     An award of the actual damages Mega has suffered by reason of the  
25 infringement charged in this Complaint, in an amount not less than Defendant's total  
26 profit from Defendant's sales of the products charged with infringing the '063  
27 patent;

28           4.     An award to Plaintiff Mega of its costs of suit herein; and

1 Dated: November 3, 2015

Respectfully submitted,

WAGNER, ANDERSON & BRIGHT PC

4 By: Patrick F. Bright

Patrick F. Bright

Attorneys for Plaintiff Mega Distribution  
Int'l Inc.

**DEMAND FOR JURY TRIAL**

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, and Local Rule 38-1, Plaintiff Mega does hereby demand trial by jury of each and every issue and claim as to which it is entitled to trial by jury under Rule 38(a) of the Federal Rules of Civil Procedure.

Dated: November 3, 2015

Respectfully submitted,

WAGNER, ANDERSON & BRIGHT PC

By: Patrick F. Bright  
Patrick F. Bright  
Attorneys for Plaintiff Mega Distribution  
Int'l Inc.